

Grant Application
Enforcement and Compliance Assurance Multi-Media Assistance Program

Oregon Inspector Training for Construction Activities

I. Project Information

State/Tribe and Department: Oregon Department of Environmental Quality (ODEQ)

Title of Project: Erosion Prevention and Sediment Control Inspector Training for
Construction Activities Regulated by the NPDES Storm Water Program

Focus Area: State, Local and Tribal Inspector Training

Total Funds Requested from EPA: \$156,750

Total Project Cost: \$179,250 (\$22,500 in total match)

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Preferred Assistance Agreement: grant

II. Summary

Summary of the problem being addressed

State and local government agencies need to be trained on how to inspect construction activities under NPDES permit. ODEQ will see an increased need for inspections of construction activities as a result of the NPDES Phase II storm water regulations requiring permits for runoff from construction activities disturbing down to one acre of land. In addition, small municipalities will need to develop erosion prevention and sediment control programs to address requirements in their NPDES municipal separate storm sewer system (MS4) permits. A major part of program implementation will be compliance inspections.

Summary of project goal(s)

- Develop a statewide erosion prevention and sediment control manual for construction operations, which will also be used by inspectors.
- Develop a model for an inspector training program.
- Develop construction inspection training materials.
- Partner with the Oregon Association of Clean Water Agencies (ACWA) to benefit from their technical expertise and contacts with local governments.
- Provide five inspector training classes around the state.
- Provide storm water program development guidance materials for local governments
- Provide five local government assistance workshops around the state
- Train at least 200 tribal, state and local government employees.

Summary of project components

- 1) Development of training and technical assistance materials and to include information on:
 - Federal and state permitting requirements
 - Federal and state inspection/enforcement law and policy
 - Procedures for conducting safe and proper compliance inspections
 - Erosion prevention and sediment control guidance that incorporates federal, state and local requirements
 - Strategies for developing local ordinances and enforcement programs
 - Key steps in assembling a comprehensive local storm water management plan
- 2) Local Government Technical Assistance
 - Organize orientation meeting for local governments to prepare them for future training.
 - Hold small group training sessions throughout Oregon to assist local agencies in developing storm water management programs and construction-related regulatory programs.
- 3) Inspector training workshops for ODEQ staff, other State of Oregon agencies (e.g., Oregon Department of Transportation, Oregon State Police, etc.) and local governments (small MS4s developing erosion prevention and sediment control programs and local governments acting as agents under contract with ODEQ to conduct construction inspections). Training will also be offered to EPA Region 10 and Region 10 states and tribes.

Summary of how the project components will address the problem & attain the goals

The project components are specifically designed to develop inspector training materials and to conduct training that will support the implementation of the federally authorized National Pollution Discharge Elimination System (NPDES) Storm Water program which ODEQ is authorized to implement.

III. Work Plan

DEQ is requesting authorization from EPA to incur pre-award costs beginning on April 3, 2003. The approval of this request will allow DEQ to maintain the project schedule described below, which has been structured to ensure the workshops occur during the Fall 2003 wet weather season.

List and description of activities

1. Development of training and technical assistance materials and workshop preparation

The inspector training materials will be designed for state, tribal and local inspectors in Oregon to build inspector capability to conduct compliance monitoring inspections of construction activities permitted under the NPDES storm water regulations. Prior to drafting the training materials, a statewide construction storm water management manual will be developed. Such a manual will provide the basis for all of the inspector guidance materials. The availability of several local and regional erosion

prevention and sediment control manuals will minimize the resources necessary to complete a tailored statewide manual.

In addition, materials will also be developed to assist local governments in the development of effective storm water regulatory and management programs. ODEQ would fund training and guidance materials and contractor costs with grant funds. The contractor will also coordinate with ODEQ in preparing and planning for the training and technical assistance workshops. These preparation tasks include development of detailed workshop agendas, presentation slides and participant knowledge surveys. Tribes, EPA Region 10 and Region 10 states will be invited to participate in the program's development and in the training workshops. Workshop outlines and content will be consistent with NPDES permitting requirements.

2. Technical Assistance to Local Governments

In 2003, ODEQ will issue a Phase II NPDES general permit for storm water discharges from small MS4s. Approximately 25 local jurisdictions in Urbanized Areas are expected to apply for permit coverage. The permit requirements include the development of construction and post-construction storm water ordinances and enforcement programs. ODEQ will fund the development and delivery of technical assistance to these local governments on how to develop erosion prevention and sediment control inspection and enforcement programs, as well as illicit discharge monitoring and municipal pollution prevention programs required by the Phase II municipal program.

A half-day orientation meeting was held in conjunction with the state municipal wastewater association's (ACWA) annual storm water conference in February, 2003. This meeting prepared participants for future grant-funded technical assistance sessions. These planned sessions will entail the contract consultant (with involvement from ODEQ and ACWA staff) preparing and conducting five small group technical assistance sessions to provide in-depth assistance to local governments on how to develop effective storm water regulatory and enforcement programs. These one-day sessions will be held in coordination with the erosion prevention and sediment control inspector training workshops (see #3 below). Costs associated with holding the workshops, including the contracted local government training specialist, will be reimbursed with grant funds. The travel-related costs of some workshop participants will be reimbursed with grant funds. Participants must apply for reimbursement and demonstrate need. More specific information on the management of technical assistance and training session expenses is provided below.

3. Inspector training workshops throughout Oregon

Five two-day inspector training workshops will be held around the state. The purpose of these workshops will be to equip participants with the knowledge and skills to conduct effective erosion prevention and sediment control inspections at construction sites. Each workshop will include a field trip to a construction site to observe and assess erosion prevention and sediment control practices. While other states in EPA Region 10 will have slightly different NPDES permit requirements, elements of the

training program will be directly geared to basic inspector training and common erosion prevention and sediment control guidance so other states may attend.

ODEQ will partner with other states (e.g., Idaho and Washington) and the Oregon Association of Clean Water Agencies (ACWA) to conduct joint workshops in key locations where staff from both states and others (EPA and tribal staff) can easily attend. Workshop content will be consistent with NPDES permitting requirements.

Costs associated with holding the workshops, including the contracted erosion prevention and sediment control instructor, will be reimbursed with grant funds. These funds will also be used for the contractor to evaluate the surveys of the workshops and provide a summary report of the findings. The travel and overnight lodging costs of some workshop participants will be reimbursed with grant funds, as part of a travel "scholarship" process. The travel to construction project field sites during the workshops will also be included in these scholarship awards. Participants must apply for reimbursement and demonstrate need.

As grant sub-recipient, ACWA will utilize grant funds for administration of direct expenses such as travel scholarships for local government representatives, printing of handouts, making meeting room arrangements, and refreshments during the training sessions. A portion of these funds will be allocated to compensate ACWA for staff time spent administering these funds and arranging the logistics of the training sessions. It should be noted that a nominal fee (\$25-\$30) will be charged to participants when they register for the workshops to pay for lunch and ACWA staff time related to managing the registration process. However, no grant funds will be used to reimburse these the lunch and registration expenses. In addition, ACWA will use the fees to reimburse expenses only, and will not generate "profit" for the organization. Therefore, the registration fees will not be classified as project income. ACWA will also provide in-kind match through staff hours spent on technical review of written documents and planning the content of the trainings.

Measures—how will the success of the project be measured?

Success will be measured with the following:

- Development of statewide construction storm water manual
- Development of training manual
- Attendance at technical assistance and training classes
- Survey of knowledge before and after training
- Requests for training manual and additional classes

Project measurement information will be summarized in semi-annual reports to the EPA's Office of Enforcement and Compliance Assurance (OECA). This summary information provided in the report format prescribed by OECA.

Sharing results—how will the results of the project be shared across states/tribes?

ODEQ will make its model inspector training program and training classes available to other interested states and tribes. ODEQ expects that the most interest in the program and classes will be generated from local governments.

IV. Project Deliverables

The deliverables from this grant-funded project are the following:

- (1) A statewide construction storm water manual for construction site operators
- (2) An inspector training manual and related materials
- (3) Local government storm water management program development guidance materials
- (4) Workshop participant surveys and survey results
- (5) Semi-annual reports to OECA on the progress and results of the project

V. Project Milestones

List project milestones with estimated dates, including estimated duration of project

April 2003 – Grant awarded

May 2003 – Request for proposals for course development and training workshops advertised

June 2003 – Contract awarded

July 2003 – First semi-annual report submitted to OECA

August 2003 – Training material developed

October 2003 through January 2004 – Five inspector training workshops and five MS4 technical assistance sessions conducted

December 2003 – Second semi-annual report submitted to OECA

March 2004 – Workshop evaluation completed

June 2004 – Final semi-annual report submitted to OECA

IV. Estimated Project Costs

Include an itemized budget for all project costs:

DEQ CONTRACTOR TASKS AND COSTS

	Estimated Rate	Estimated Quantity	Estimated Total
Development of training and technical assistance materials	\$150/hour	400 hours	\$60,000
Workshop preparation and planning	\$150/hour	100 hours	\$15,000
Local government training specialist	\$1,350 (9 hr day)	5 days (5 one-day trainings)	\$6,750
Erosion and sediment control instructor	\$1,350 (9-hr day)	10 days (2 days/workshop; 5 workshops)	\$13,500
Instructor travel, lodging, meals	\$1,000/workshop	10 workshops and training sessions	\$10,000
Post-Workshop Analysis	\$150/hour	30 hours	\$4,500
SUBTOTAL			\$109,750

ACWA TASKS AND COSTS

	Estimated Rate	Estimated Quantity	Estimated Total
Travel scholarships for participants	\$200/person/day + small amount for "field trip" travel	<ul style="list-style-type: none"> • 60 (out of 200) for 2-day inspector workshop • 35 (out of 100) for 1-day local government workshop 	\$32,500
ACWA staff costs for arranging & coordinating training session logistics	\$60/hour	75 hours	\$4,500
Handouts for both sets of workshops	\$20/person	200 people at erosion control inspector workshops, and 100 people at local government assistance workshops	\$6,000
Refreshments during workshops	\$8/person/day	200 people for 2 days and 100 people for 1 day	\$4,000
SUBTOTAL			\$47,000

STATE AND OTHER MATCH

	Estimated Rate	Estimated Quantity	Estimated Total
State and Other Match	\$50/hour environmental specialist	240 hours	\$12,000
	\$60/hour manager	100 hours	\$6,000
	\$60/hour ACWA manager	75 hours	\$4,500
SUBTOTAL			\$22,500

TOTAL	\$179,250
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